

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MINTEL INTERNATIONAL GROUP, LTD, a United Kingdom corporation,)	
)	
Plaintiff,)	Case No.: 08 CV 3939
)	
v.)	Judge Robert M. Dow
)	
MEESHAM NEERGHEEN, an individual,)	
)	
Defendant.)	
)	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE PLAINTIFF'S SUPPLEMENTAL
MEMORANDUM OF LAW IN SUPPORT OF PRELIMINARY INJUNCTION**

Plaintiff MINTEL INTERNATIONAL GROUP, LTD. ("Mintel") hereby requests leave from this Court to proceed with filing Plaintiff's Supplemental Memorandum of Law in Support of Preliminary Injunction. In support of its motion, Mintel states as follows:

1. Mintel requests leave of Court to proceed with filing Mintel's Supplemental Memorandum of Law in Support of Preliminary Injunction ("Supplemental Memorandum").
2. Mintel's Supplemental Memorandum contains references and citations to material that has been designated as "confidential" and/or "confidential – attorneys' eyes only" by opposing counsel.
3. Pursuant to Local Rule 26.2(b), no document may be filed under seal without a prior order of the court specifying the particular document or portion of the document to be filed under seal. Therefore, only a document that has been previously determined by the court to be deserving of protection may be filed under seal, regardless of the existence of any protective order. *See* L.R. 26.2(b).

4. The Court has not yet ruled that the documents that are referenced within Mintel's Supplemental Memorandum are deserving of protection.

5. On August 28, 2008, Mintel provided Defendant's counsel with a copy of Mintel's Supplemental Memorandum and all necessary exhibits.

6. Mintel has also provided the Honorable Robert Dow with two copies of Mintel's Supplemental Memorandum and all necessary exhibits. The documents were delivered to the chambers of Judge Dow on August 28, 2008.

7. Contemporaneously herewith the filing of this motion is a Notice of Motion, setting Mintel's Motion for Leave to File Mintel's Supplemental Memorandum of Law in Support of Preliminary Injunction for hearing on Tuesday, September 2, 2008 at 9:15 a.m.

8. Should Defendant's counsel deem it necessary, Defendant's counsel can proceed with filing and noticing for hearing a Motion to File Under Seal prior to Tuesday, September 2, 2008 at 9:15 a.m.

WHEREFORE Plaintiff Mintel International Group, Ltd. respectfully requests that this Court grant Mintel leave to proceed with filing Plaintiff's Supplemental Memorandum of Law in Support of Preliminary Injunction.

Respectfully submitted,

MINTEL INTENTIONAL GROUP, LTD.

By: /s/ Joseph R. Marconi

One of Their Attorneys

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